



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

SITE: Brown's Dump  
BREAK: 3.1  
OTHER: \_\_\_\_\_

3 1 0028

October 29, 2002

4WMD - SSMB

By U.S. Mail

Mr. Chris Pearson  
Department of Solid Waste and Resource Management  
140 West Monroe Street  
Suite 200  
Jacksonville, Florida 32202-3713

SUBJ: Approval of Dioxin Background Sampling Plan  
Brown's Dump Site - Jacksonville  
EPA I.D. Number: FLD 980 847 016

Dear Mr. Pearson:

The U.S. Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP) have completed review of the above document dated October 3, 2002. EPA concludes that the plan is acceptable and should be implemented according to the schedule contained in the work plan.

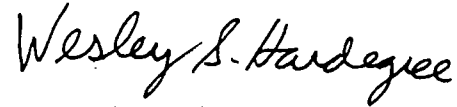
During review of the plan, the State voiced concern over use of four of the sixteen identified sampling locations with elevated benzo(a)pyrene (BaP). However, EPA does not believe that these sampling locations are invalidated just because the detections of BaP at these four locations exceed the State's risk number. For example, polycyclic aromatic hydrocarbons (PAHs) can have multiple sources in inhabited areas and appear to be ubiquitous. Further, the outlier test performed by EPA along with review of other sampling studies of PAH distributions lead EPA to conclude that the four sampling locations questioned by the State are valid.

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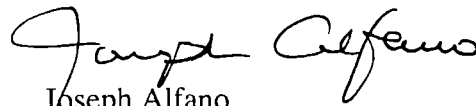


If you have any questions on this letter, please feel free to call me at (404) 562-8938 or Joe Alfano at (404) 562- 8933.

Sincerely,



Wesley S. Hardegree  
Remedial Project Manager  
Brown's Dump



Joseph Alfano  
Remedial Project Manager  
Jacksonville Ash

cc: Michele Burgesss, EPA  
Mary Nogas, FDEP - Northeast District  
Nellie Tunsill - COEJ  
Daine Kerr, NRCA  
Dr. Kevin Pegg, Nucleic Assays Corp.  
Dr. Aaron Hilliard, Duval County DOH  
Deborah Schroth, FL Legal Services